

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Maurice Lewis,)	
)	
<i>Plaintiff,</i>)	
)	
-vs-)	No.
)	
City of Chicago, Chicago Police)	<i>(jury demand)</i>
Officer L. Alexander, #13518,)	
Chicago Police Officer J. Alvarado,)	
#12730, Chicago Police Lieutenant)	
S. Dedore, #254, Chicago Police)	
Officer S. Korhonen, #2826,)	
Chicago Police Officer A. Mora,)	
#10636, Chicago Police Officer A.)	
Wyroba, #3152,)	
)	
<i>Defendants.</i>)	

COMPLAINT

Plaintiff, by counsel, alleges as follows:

1. This is a civil action arising under 42 U.S.C. § 1983. The jurisdiction of this Court is invoked pursuant to 28 U.S.C. § 1343 and 28 U.S.C. § 1367.
2. Plaintiff Maurice Lewis is a resident of the Northern District of Illinois.
3. Defendant City of Chicago is an Illinois municipal corporation.

4. Defendant Chicago Police Officer L. Alexander, #13518, was at all times relevant acting under color of his office as a Chicago police officer.

5. Defendant Chicago Police Officer J. Alvarado, #12730, was at all times relevant acting under color of his office as a Chicago police officer.

6. Defendant Chicago Police Lieutenant S. Dedore, #254, was at all times relevant acting under color of his office as a Chicago police officer.

7. Defendant Chicago Police Officer S. Korhonen, #2826, was at all times relevant acting under color of his office as a Chicago police officer.

8. Defendant Chicago Police Officer A. Mora, #10636, was at all times relevant acting under color of his office as a Chicago police officer.

9. Defendant Chicago Police Officer A. Wyroba, #3152, was at all times relevant acting under color of his office as a Chicago police officer.

10. On September 12, 2013, more than two years before the filing of this action, the defendant officers arrested plaintiff and caused plaintiff to be charged with illegal possession of a firearm.

11. Plaintiff was arrested after defendants searched an apartment in the 4200 block of West Walton Street in Chicago, Illinois.

12. When the defendant officers arrived at the apartment, three people were present: plaintiff Maurice Lewis, his brother Marcus Lewis, and Melissa Collins.

13. The defendant officers claim to have found a firearm during the search of the apartment.

14. At all times relevant, the defendant officers did not have a reasonable basis to believe that plaintiff was in possession of a firearm,

15. After arresting plaintiff, the defendant officers fabricated evidence, thereby causing plaintiff to be held in custody and prosecuted for an offense. These acts include:

- a. The defendant officers prepared police reports containing the material false statement that plaintiff had admitted to residing in the Walton Street Apartment.

- b. The defendant officers prepared police reports containing the material false statement that they had found and seized evidence establishing that plaintiff resided in the Walton Street Apartment.

16. Plaintiff did not reside in the Walton Street Apartment. Nor did plaintiff tell any of the officers that he resided in the Walton Street

Apartment. None of the officers found anything in the Walton Street Apartment indicating plaintiff resided there.

17. As a result of the above described wrongful acts, plaintiff was deprived of his liberty and held at the Cook County Jail until September 29, 2015 when it became apparent that the prosecution was based on false and fabricated evidence and the criminal charges were dismissed.

18. As a result of the foregoing, plaintiff was deprived of rights secured by the Fourth and Fourteenth Amendments.

19. As a supplemental state law claim against defendant City of Chicago only: as a result of the foregoing, plaintiff was subjected to a malicious prosecution under Illinois law.

20. Plaintiff hereby demands trial by jury.

Accordingly, plaintiff requests that appropriate compensatory and punitive damages be awarded against the individual defendants, and that appropriate compensatory damages only be awarded against defendant City of Chicago.

/s/ Kenneth N. Flaxman
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